

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY UPS/USPS-T37-69  
(September 22, 1997)

The United States Postal Service hereby objects to interrogatory UPS/USPS-T37-69 on the grounds of burden and relevance. The interrogatory asks for copies of Forms 8125 (dropshipment clearance document) and the corresponding mailing statements for ten "representative" plant-verified drop shipments occurring in FY 1997 at the Chicago BMC for each of eight situations depending on the manner the vehicle is loaded and the classes of mail contained therein. The interrogatory also asks for an identification of the postal facility and zone chart used for postage calculation.

The Postal Service does not know what "representative" could possibly mean in this context. No one mailer or mailing situation can be said to be representative of all others with any degree of certainty. Answering this interrogatory would put the Postal Service in the position of asserting that a particular state of facts was representative of nationwide patterns. In order to do so with any degree of confidence, the Postal Service would have to undertake an even more burdensome search than the one actually requested. In fact, it would be an impossible task to attest to the representativeness of the ten examples of each of eight situations that the interrogatory lays out.

The interrogatory, even on its face, requires an extensive search to determine whether the eight situations described even occurred, much less ten times each, at the Chicago BMC. The burden of such an undertaking cannot be justified. This is

especially true in light of the lack of relevance of this inquiry to witness Mayes's testimony or any other aspect of this case. The inquiry follows up on a reference witness Mayes provided to the DMM when UPS asked for information regarding requirements for mailers to notify postal facilities of BMC mailings. The relevance of *such requirements to any aspect of her testimony is tenuous at best. The relevance of the Chicago BMC, as opposed to any other BMC, is also questionable, as is the relevance of inquiries regarding Standard (A) mail. The utter lack of relevance suggests some other motive than an attempt to discover admissible evidence.*

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

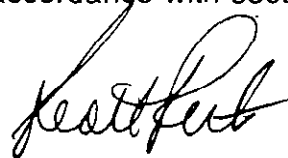


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Scott L. Reiter

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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Scott L. Reiter

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